

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

VLADISLAV KLYUSHIN  
Defendant

CRIMINAL NO. 21-cr-10104-PBS

**ASSENTED-TO MOTION TO CONTINUE MOTION IN LIMINE FILING DEADLINE  
TO DECEMBER 19, 2022**

Now comes the Defendant, Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to continue the motion *in limine* filing deadline of December 15, 2022 to December 19, 2022.

This Honorable Court set a December 15, 2022, deadline for the filing of the parties’ motions *in limine*. Dkt. 113. Due to family circumstance, one of Mr. Klyushin’s attorneys needs additional time to finalize and review the motions with Mr. Klyushin. Additionally, the defense has sought additional information concerning the bases for one of the Government’s expert witnesses’ opinions to clarify, what, if any, challenges the defense will bring to the proposed testimony. Accordingly, with the assent of the Government, the defense respectfully requests this Honorable Court to extend the motion *in limine* filing deadline to December 19, 2022.

**WHEREFORE**, the defense respectfully requests that this motion be granted.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The undersigned counsel has conferred with the Government, who by and through AUSAs Seth Kosto and Stephen Frank, assent to this request.

Respectfully Submitted,  
Vladislav Klyushin,  
By His Attorney,

/s/ Maksim Nemtsev  
Maksim Nemtsev, Esq.  
Mass. Bar No. 690826  
20 Park Plaza, Suite 1000  
Boston, MA 02116  
(617) 227-3700  
menemtsev@gmail.com

/s/ Marc Fernich  
Marc Fernich  
Law Office of Marc Fernich  
800 Third Avenue  
Ste Floor 20  
New York, NY 10022  
212-446-2346  
Email: maf@fernichlaw.com

Dated: December 15, 2022

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, December 15, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev  
Maksim Nemtsev, Esq.